

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**In re:**

**ROSA HAYDEE GONZALEZ MILLAN**

**CASE NO. 17-03246 (ESL)**

**Debtor(s)**

**Chapter 13**

**RUSHMORE LOAN MANAGEMENT  
SERVICES LLC, SERVICER FOR  
ROOSEVELT CAYMAN ASSET  
COMPANY II**

**Movant**

**INDEX**

**VS.**

**ROSA GONZALEZ MILLAN  
AND JOSE CARRION MORALES  
CHAPTER 13 TRUSTEE**

**☒ of acts against property under  
§362(d)(1) "CAUSE"**

**Respondents**

**MOTION REQUESTING ENTRY OF ORDER GRANTING RELIEF FROM STAY**

TO THE HONORABLE COURT:

COMES NOW Movant **RUSHMORE LOAN MANAGEMENT SERVICES LLC, SERVICER FOR ROOSEVELT CAYMAN ASSET COMPANY II** ("Rushmore"), through its undersigned counsel, and very respectfully alleges, states and prays:

1. On June 14, 2018 (Docket No. 31), Rushmore filed a Motion for Relief from Stay regarding Debtor's real property located at: D2 1 st. El Vivero Dev., in Gurabo, Puerto Rico; for lack of post-petition payments regarding loan 9520.

2. On July 10, 2018 (Docket No. 40), this Honorable court modified the automatic

stay for loan modification purposes only and ordered the parties to inform the status of the process within 60 days.

3. As of today, Debtor has not made contact with the Loss Mitigation department and arrears regarding loan 9520 total \$3,249.80

**WHEREFORE**, it is respectfully requested that this Honorable Court enter an order granting RUSHMORE relief from stay.

**NOTICE**

**WITHIN FOURTEEN (14) DAYS FROM SERVICE OF THIS MOTION, ANY PARTY OBJECTING TO THE RELIEF SOUGHT HEREIN, SHALL SERVE AND FILE AN OBJECTION OR OTHER APPROPRIATE RESPONSE TO THIS MOTION WITH THE CLERK'S OFFICE OF THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO. IF NO OBJECTION OR OTHER RESPONSE IS FILED WITHIN THE TIME ALLOWED HEREIN, THE MOTION WILL BE DEEMED UNOPPOSED AND MAY BE GRANTED UNLESS: (1) THE REQUESTED RELIEF IS FORBIDDEN BY LAW; (2) THE REQUEST RELIEF IS AGAINST PUBLIC POLICY; OR (3) IN THE OPINION OF THE COURT, THE INTEREST OF JUSTICE REQUIRES OTHERWISE.**

**WE HEREBY CERTIFY** that a true and correct copy of the foregoing has been filed electronically on this day with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties who have made an electronic appearance herein.

San Juan, Puerto Rico, this 13th day of September, 2018.

s/SERGIO A. RAMIREZ DE ARELLANO  
SARLAW LLC  
Attorney for RUSHMORE  
Rushmore Center, Suite 1022  
209 Muñoz Rivera Ave.  
San Juan, PR 00918-1009  
Telephone Number: (787) 765-2988  
Facsimile Number: (787) 765-2973  
USDC #126804  
[sramirez@sarlaw.com](mailto:sramirez@sarlaw.com)

## MFR CHECKLIST

DATE:	9/12/2018	LOAN NUMBER:	#####9520
Investor # / Name:	Roosevelt Cayman Asset Company II		
Date Bk Filed:	5/8/2017	BK Number: 17-03246	CHAPTER: 13

### POST PETITION PAYMENTS

Start date		End date	PMT AMT	# of PMTS	Total
10/1/2017	thru	11/1/2017	\$239.98	2	\$479.96
2/1/2018	thru	9/1/2018	\$239.98	8	\$1,919.84
	thru				\$0.00
	thru				\$0.00
	thru				\$0.00
	thru				\$0.00
	thru				\$0.00
	thru				\$0.00
			Total	10	\$2,399.80

### FEES ( FEE1 Screen)

Reason	Amount
Late	
NSF/SpeedPay	
Recording	
Other	
Total	\$0.00

### Corp Adv (DDCH screen)

Reason	Amount
FC ATTY Fees	
FC Costs	
BK Atty Fees	\$850.00
BK Costs	
BPO	
Prop Inspections	
Prop Pres	
Acquired Recoverable Balance	
Other - Door Knock	
Total	\$850.00

Less suspense credit	Total	\$0.00
SER1 screen		

**MFR TOTAL \$3,249.80**

The subscribing representative of Rushmore Loan Management Services LLC declares under penalty of perjury that according to the information gathered, the foregoing information is true and correct.

s/Melissa Cesareo

Bankruptcy Specialist